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August 19, 2016

MEMBERS OF THE BOARD

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Mr. Wayne Nastri, Acting Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dear Mr. Nastri:

The Los Angeles County Board of Supervisors, in collaboration with the Department of Public Health, strongly urges you to work with the necessary State and Federal agencies to adopt an Air Quality Management Plan (AQMP) that will improve air quality and public health using regulatory control measures based on available resources instead of adopting the current proposal for clean vehicle incentives that predominantly relies on securing billions of dollars in funding that currently does not exist.

In order to pay for these incentives, the AQMP predicts that the South Coast Air Quality Management District (SCAQMD) will need to secure approximately \$11,000,000,000 to \$14,000,000,000 in funding over a seven to fifteen year period. None of this funding has yet been secured, and securing the approximately \$1,000,000,000 a year needed from the Federal and State governments to provide these financial incentives is by no means a sure bet. The AQMP proposes developing an action plan "as part of the AQMP public adoption process to identify the necessary actions by the District, the region, the State, the Federal government, and other partnerships to ensure the requisite levels of funding are secured as early as possible and sustained through 2031" (AQMP, ES-8).

In short, the AQMP proposes providing significant financial incentives to polluters to clean up their fleets, from funding that does not yet exist. Should the funding fail to materialize, the AQMP offers no meaningful back up plan, instead focusing on provisions in the Federal Clean Air Act that would allow for falling short of air pollution reduction goals (see AQMP, 4-44 to 4-45). In the meantime, the Basin's residents would remain captive to the region's poor air quality, and the associated negative health impacts. Taking this gamble poses an unacceptable level of risk to Los Angeles County residents, particularly those who are in our most vulnerable communities.

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The implementation of this plan to improve air quality is critical to improving public health in the County. In principle, the Department of Public Health agrees with the overall goals. One aspect that is lacking is adequate attention to abatement of stationary source odorous emissions that impact health of nearby residents but often do not exceed applicable standards. Such emissions have become a critical issue with regard to recent significant community public health interventions, such as the Allenco Oil field site, the Sunshine Canyon Landfill community, and the Aliso Canyon gas leak disaster. The Health Effects section of the AQMP does not address or acknowledge odor issues, and related health effects from odors or other low-level exposures that emanate from facilities that are closely situated to communities. This is a significant gap in the AQMP. Given the County's recent responses to air emissions causing odor-related health effects, the AQMP should delineate improvements in the way that local, state, and federal agencies can prevent, survey, mitigate, and respond to odors. This issue should also be discussed in Chapter 8, "Beyond Requirements."

We strongly urge the SCAQMD to work with the necessary State and Federal agencies to adopt an AQMP that will meaningfully improve air quality and public health.

Sincerely,



HILDA L. SOLIS
Chair of the Board
Supervisor, First District



MARK RIDLEY-THOMAS
Supervisor, Second District



SHEILA KUEHL
Supervisor, Third District